

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE NATIONAL COLLEGIATE
ATHLETIC ASSOCIATION STUDENT-
ATHLETE CONCUSSION INJURY
LITIGATION**

MDL No. 2492

Master Docket No. 1:13-cv-09116

**This Documents Relates To:
All Cases**

Judge John Z. Lee

Magistrate Judge Geraldine Soat Brown

AGREED MOTION FOR EXTENSION OF TIME

Plaintiff Anthony Nichols (“Nichols”), by and through his counsel, respectfully moves the Court for a 21-day extension of time (until July 15, 2015) to file his objection to the Lead Plaintiffs’ pending motion for preliminary approval of class settlement. (Dkt. 154.) In support of this motion, Nichols states as follows:

1. On May 14, 2015, the Court directed Nichols to file a memorandum regarding the viability of a Rule 23(b)(3) personal injury damages class by June 24, 2015. (Dkt. 182).
2. Since that time, Nichols’ counsel have been working diligently to prepare the memorandum, including by reviewing the relevant discovery and engaging potential experts. However, given the complexity of the issues and the size of the record, Nichols respectfully requests a 21-day extension (until July 15, 2015) of the deadline to file his memorandum with the Court.
3. Nichols believes that the additional time is necessary to present the Court with the best possible record from which to evaluate the fairness of the proposed class settlement.
4. Nichols’ counsel conferred with Interim Class Counsel and counsel for NCAA on

June 19, 2015. Neither Interim Class Counsel nor counsel for NCAA opposes this motion, and all agree to the requested extension.

5. Accordingly, Nichols respectfully submits that good cause exists for the requested extension and that this motion is not brought for the purposes of delay.

WHEREFORE, Anthony Nichols respectfully requests a 21-day extension of time until July 15, 2015 to submit his memorandum regarding the viability of a personal injury damages class under Rule 23(b)(3), and for such further relief as this Court deems equitable and just.

Respectfully submitted,

ANTHONY NICHOLS

By: /s/ Ari J. Scharg
One of his Attorneys

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CERTIFICATE OF SERVICE

I, Ari J. Scharg, an attorney, hereby certify that on June 19, 2015, I served the above and foregoing ***Agreed Motion for Extension of Time***, by causing true and accurate copies of such paper to be filed and transmitted to all counsel of record via the Court's CM/ECF electronic filing system.

/s/ Ari J. Scharg